

1 Dennis F. Dunne (admitted *pro hac vice*)  
2 Samuel A. Khalil (admitted *pro hac vice*)  
MILBANK LLP  
2 55 Hudson Yards  
3 New York, New York 10001-2163  
Telephone: (212) 530-5000  
4 Facsimile: (212) 530-5219

5 | *and*

Gregory A. Bray (SBN 115367)  
Thomas R. Kreller (SBN 161922)  
MILBANK LLP  
2029 Century Park East, 33rd Floor  
Los Angeles, CA 90067  
Telephone: (424) 386-4000  
Facsimile: (213) 629-5063

11 | *Counsel for the Official Committee  
of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

15

In re:

16 PG&E CORPORATION

17 - and -

18      **PACIFIC GAS AND ELECTRIC  
COMPANY.**

## Debtors.

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**JOINDER OF OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS TO DEBTORS'  
PRELIMINARY OPPOSITION TO GHOST  
SHIP EXECUTIVE COMMITTEE'S MOTION  
FOR RELIEF FROM THE AUTOMATIC  
STAY**

Date: December 17, 2019  
Time: 10:00 a.m. (Pacific Time)  
Place: United States Bankruptcy Court,  
Courtroom 17, 16th Floor  
450 Golden Gate Avenue,  
San Francisco, CA 94102

Re: Docket No. 5093

1           The Official Committee of Unsecured Creditors (the “Committee”) appointed in the chapter  
2        11 cases of the above-captioned debtors-in-possession (collectively, the “Debtors”) hereby supports  
3        and joins in the *Debtors’ Preliminary Opposition to Motion for Relief from Automatic Stay to Permit*  
4        *the Courts of the State of California to Conduct a Jury Trial and Related Pretrial and Post Trial*  
5        *Matters in Connection with the Ghost Ship Fire Cases* [Docket No. 5093] (the “Preliminary  
6        Opposition”).<sup>1</sup> The Committee reserves all rights to be heard before the Court in connection with the  
7        Motion (and any joinders thereto), to amend, supplement, or otherwise modify this Joinder prior to  
8        or during the preliminary hearing on the Motion, and to assert such other and further objections prior  
9        to the final adjudication of the matter.

11           WHEREFORE, for the reasons set forth in the Preliminary Opposition, the Committee  
12        respectfully requests that the Court enter an order: (i) denying Movant’s request for relief from the  
13        automatic stay at this time; and (ii) granting such other and further relief as is just and proper.

14        Dated: December 12, 2019

**MILBANK LLP**

/s/ Gregory A. Bray  
DENNIS F. DUNNE  
SAMUEL A. KHALIL  
GREGORY A. BRAY  
THOMAS R. KRELLER

*Counsel for the Official Committee of  
Unsecured Creditors*

27        1 Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Preliminary  
28        Opposition.